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Attorneys for Kevin Long and Millcreek Commercial, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

PATTI KLAIR, ROBERT MYERS, ROBERT BARNES, ERIC CARNRITE, ELIZABETH HILL-D'ALESSANDRO, ROBERT TANNEHILL, DITAS TANNEHILL, JOSE REMENTERIA, TEENA REMENTERIA, CHARLES BRAUER, LAURA BRAUER, KAREN MARION, KATHERINE MADERA, CARL MCQUEARY, LYNN MCQUEARY, DONALD PATTERSON, KURTIS TRENT MANNING, TONY SCHAKER, PATRICK WHITE, HILDEGARD WHITE, QUEST REALTY TRUST, SECURE STORAGE LLC, KURTIS TRENT MANNING LIVING TRUST,

Plaintiffs,

vs.

KEVIN LONG, MILLCREEK COMMERCIAL, LLC, COLLIERS INTERNATIONAL, ANDREW BELL, TREVOR WEBER, SPENCER TAYLOR, BLAKE MCDOUGAL, SCOTT RUTHERFORD, EQUITY SUMMIT GROUP, ELEVATED 1031,

Defendants.

**MOTION TO WITHDRAW AS
COUNSEL FOR DEFENDANT
MILLCREEK COMMERCIAL, LLC**

Case No. 2:23-cv-00407-AMA-CMR

Judge Ann Marie McIff Allen

Magistrate Judge Cecilia M. Romero

Pursuant to DUCivR 83-1.4, Terry E. Welch, Bentley J. Tolk and Rodger M. Burge of the law firm Parr Brown Gee and Loveless hereby individually and collectively move the Court for leave for each of them to withdraw as counsel for Defendant Millcreek Commercial, LLC (“Millcreek”) (but **not** for Defendant Kevin Long) in the above-captioned action. Withdrawal is necessary because Millcreek has ceased operations.

Millcreek’s last-known contact information is as follows:

Millcreek Commercial, LLC
1064 S. North County Blvd., Suite 350
Pleasant Grove, UT 84062
kevin@millcreekcommercial.com
(385) 248-0613

Millcreek consents to the withdrawal.

There are no scheduled hearings, but Plaintiffs filed a motion on January 15, 2025 for leave to file a First Amended Complaint. This case is in its early stages. The deadline (which is dependent upon the ultimate date of Plaintiffs’ initial discovery responses) to file a motion to amend pleadings and to file a motion to add parties has not yet passed, and the fact discovery cutoff in this case is July 28, 2025. The parties have not yet taken any depositions in this case.

The undersigned attorneys hereby certify that this Motion is being filed with the Court and thereby served on all parties, and that a copy of this Motion is also concurrently being served on Millcreek by email and by certified mail via the U.S. Postal Service at the addresses listed above.

A copy of a proposed order is attached hereto as Exhibit A.

DATED this 21st day of January, 2025.

PARR BROWN GEE & LOVELESS

By: /s/ Terry E. Welch
Terry E. Welch

By: /s/ Bentley J. Tolk
Bentley J. Tolk

By: /s/ Rodger M. Burge
Rodger M. Burge

*Attorneys for Kevin Long and Millcreek
Commercial, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of January, 2025, I caused to be served a true and correct copy of the foregoing **MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT MILLCREEK COMMERCIAL, LLC** via the CM/ECF system, which automatically provided notice to all counsel of record.

/s/ Bentley J. Tolk